

EXHIBIT 8

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
DAILY NEWS, LP; CHICAGO TRIBUNE :
COMPANY, LLC; ORLANDO SENTINEL : No. 1:24-cv-03285-SHS
COMMUNICATIONS COMPANY, LLC; :
SUN-SENTINEL COMPANY, LLC; SAN :
JOSE MERCURY-NEWS, LLC; DP MEDIA :
NETWORK, LLC; ORB PUBLISHING, :
LLC; AND NORTHWEST :
PUBLICATIONS, LLC, :
:
Plaintiffs, :
:
v. X

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPKO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

**OPENAI DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST
SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York ("Local Rules"), Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC and OpenAI Holdings, LLC (collectively, "OpenAI") hereby object and respond to Plaintiff's First Set of Requests for Production of Documents ("Requests"). To the extent that OpenAI agrees to produce documents in response to these Requests, each entity is agreeing to produce only its own documents, to the extent those documents can be located after a reasonable search. Furthermore, an agreement by

REQUEST FOR PRODUCTION NO. 45:

Query, session, and chat logs reflecting or analyzing user sessions related to the Publishers' Content within Defendants' Generative AI Products and Services, including, for each session, user queries paired with responses to those queries.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

OpenAI objects to the production of confidential and sensitive information before a protective order has been entered in this case. OpenAI further objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects that this request is not relevant to any claim or defense in this litigation to the extent it calls for the production of documents regarding OpenAI's products other than the GPT models that were used for ChatGPT.

Subject to the foregoing general and specific objections, OpenAI states that it is willing to meet and confer regarding an appropriately narrow scope for this request.

REQUEST FOR PRODUCTION NO. 46:

Documents sufficient to show how Defendants' Generative AI Products and Services generate suggested follow-up queries for users.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

OpenAI objects to the production of confidential and sensitive information before a protective order has been entered in this case. OpenAI further objects to the production of electronically stored information before an applicable ESI protocol has been entered. OpenAI objects that this request is not relevant to any claim or defense in this litigation, including to the extent it calls for the production of documents regarding OpenAI's products other than the GPT models that were used for ChatGPT.

Dated: San Francisco, California
July 15, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2024, a true and correct copy of the foregoing **OPENAI DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was served via electronic mail upon:

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